UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN GREEN BAY DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v. Case No. 19-CR-201

MASON BEAUDRY,

Defendant.

DEFENDANT'S MOTION TO ADJOURN SENTENCING HEARING

The defendant, Mason Beaudry, by and through undersigned counsel, respectfully requests the Court adjourn the sentencing hearing currently set for Monday, June 29, 2020 at 10:30 a.m, based on the General Order 20-11 which adjourns all in person court appearances until after July 1, 2020. In support, Mr. Beaudry states the following:

- 1. Mr. Beaudry is charged in one count of a two count indictment with possession of a firearm by a convicted felon in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).
- 2. Mr. Beaudry made his initial appearance and was arraigned on that count on November 19, 2019. He was released on a signature bond with all standard conditions and the following special conditions: report to pretrial

services as directed; avoid all contact with co-defendant, Juan Cardenas; do not possess a firearm; and, substance abuse testing and treatment as determined by pretrial services. To counsel's knowledge, Mr. Beaudry has been compliant with conditions of release.

- 3. Mr. Beaudry wants to have an in person sentencing hearing. Further, counsel and Mr. Beaudry have not discussed his Pre-Sentence Investigation Report in detail as it was mailed but never received by Mr. Beaudry. Counsel intends to send another one tomorrow as well as one via email but counsel is requesting additional time to review it to determine if any objections need to be filed. Counsel prefers doing that in person at the beginning of July when her office re-opens. For that reason, counsel is requesting Mr. Beaudry's sentencing hearing be adjourned until the end of July/beginning of August.
- 4. Counsel also communicated with Assistant United States Attorney Daniel Humble and he has no objection to this request.

THEREFORE, on the above grounds, Mason Beaudry respectfully requests that his sentencing hearing currently set for June 29, 2020, be adjourned until the end of July/beginning of August.

Dated at Green Bay, Wisconsin, this 17th day of June, 2020.

FEDERAL DEFENDER SERVICES OF WISCONSIN, INC.

Respectfully submitted,

s/ Krista Halla-Valdes

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